

MEMO ENDORSED

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March 2, 2022

Hon. Valerie E. Caproni
United States District Judge
United States District Court
Southern District New York
40 Foley Square, Room 240
New York, New York 10007

**Re: Lenore D'Anzieri v. Harrison Global LLC d/b/a DavEl | BostonCoach et al.,
No. 21 Civ. 8506 (VEC)**

Dear Judge Caproni:

We represent the Plaintiff in the above-referenced matter. We respectfully submit this letter on behalf of the parties regarding the Notice Of Initial Pretrial Conference (Dkt. #15).

Defendants have filed a motion to dismiss in this action. Plaintiff's time to amend the Complaint in response to Defendants' motion has been extended to April 8, 2022 and if Plaintiff elects not to amend the Complaint in response to Defendants' motion, opposition and reply papers on the motion are due by April 8 and 29, 2022, respectively. (Dkt. #17). The foregoing schedule applies to Defendants' motion as re-filed on February 25, 2022, as Defendants merely resubmitted their motion papers on February 25th as separately numbered docket entries.

Based on the above, the parties jointly request that the due date for submission of a proposed Civil Case Management Plan And Scheduling Order (and related joint letter) be extended from March 3, 2022 to April 15, 2022. The parties similarly request that the initial pretrial conference be adjourned from March 11, 2022 to a date after April 15, 2022.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,
/s/ Kenneth A. Goldberg
Kenneth A. Goldberg

Application GRANTED. The Initial Pre-Trial Conference currently scheduled for Friday, March 11, 2022 at 2:00 p.m. is hereby ADJOURNED until **Friday, April 22, 2022, at 2:00 p.m.** The deadline for parties' joint letter and proposed Case Management Plan is hereby ADJOURNED from March 3, 2022 until **April 14, 2022.**

SO ORDERED.

Handwritten signature of Valerie Caproni in blue ink, with the date 3/2/22 written below it.

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE